

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	BANKRUPTCY NO. 14-13526-amc
	:	
RICHARD A. CURRO	:	CHAPTER NO. 13
JAMIE L. CURRO	:	
Debtors	:	
NATIONSTAR MORTGAGE LLC	:	
Movant	:	
v.	:	
RICHARD A. CURRO	:	
JAMIE L. CURRO	:	
Respondents	:	

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**NOTICE OF MOTION
AND HEARING DATE**

NATIONSTAR MORTGAGE LLC has filed a *Motion to Allow Claims- Late Filed* with the court to permit.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. PLEASE TAKE NOTICE that on **December 12, 2017 at 11:00 A.M.**, or as soon thereafter as counsel may be heard, Robertson, Anschutz & Schneid, PL. attorneys for NATIONSTAR MORTGAGE LLC, the within creditor ("Creditor"), shall move before the Honorable ASHLEY M. CHAN, United States Bankruptcy Judge, at the United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107, Courtroom 5, for an Order pursuant to 11 U.S.C. § 105 granting such Creditor's late filed proof of claim be deemed allowed, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the already-filed Motion to Allow Claims- *Late Filed*. A proposed form of Order is also being submitted.

2. PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the CLERK, UNITED STATES BANKRUPTCY COURT, 900 Market Street #400, Philadelphia, PA 19107 and simultaneously served on Secured Creditor's counsel, ROBERTSON, ANSCHUTZ & SCHNEID, PL, 130 CLINTON RD., SUITE 202, FAIRFIELD, NJ 07004, so as to be received no later than seven (7) days before the return date set forth herein.
3. PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.
4. PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office(s) in Philadelphia at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

DATED: November 7, 2017

Robertson, Anschutz & Schneid, PL
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By: /s/ Kevin BATTERY
Kevin BATTERY, Esquire
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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been filed with the Clerk of Court using the CM/ECF system on this 7th day of November. I also certify that the foregoing *Notice of Motion and Hearing* was served on this day by United States Mail, Electronic Mail, or via the CM/ECF system to the parties on the service list stated below:

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By: /s/ Kevin Buttery
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